

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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SUPERB MOTOR, INC., TEAM AUTO SALES LLC., ROBERT ANTHONY URRUTIA, 189 SUNRISE HIGHWAY AUTO, LLC., NORTHSHORE MOTOR LEASING, LLC., BRIAN CHABRIER, individually and derivatively as member of NORTHSHORE MOTOR LEASING, LLC., JOSHUA AARONSON, individually and derivatively as a member of 189 SUNRISE HWY AUTO, LLC., JORY BARON, 1581 HYLAN BLVD AUTO, LLC., 1580 HYLAN BLVD AUTO, LLC., 1591 HYLAND BLVD AUTO, LLC., 1632 HYLAN BLVD AUTO, LLC., 1239 HYLAN BLVD AUTO, LLC., 2519 HYLAND BLVD AUTO, LLC., 76 FISK STREET REALTY, LLC., 446 ROUTE 23 AUTO, LLC., and ISLAND AUTO MANAGEMENT, LLC.,

Plaintiffs,

-against-

ANTHONY DEO, SARAH DEO, HARRY THOMASSON, DWIGHT BLANKENSHIP, MARC MERCKLING, MICHAEL LAURIE, THOMAS JONES, CPA, CAR BUYERS NYC, INC., GOLD COAST CARS OF SYOSSET, LLC., GOLD COAST CARS OF SUNRISE, LLC., GOLD COAST MOTORS AUTOMOTIVE GROUP, LLC., GOLD COAST MOTORS OF LIC, LLC., GOLD COAST MOTORS OF ROSLYN, LLC., GOLD COAST MOTORS OF SMITHTOWN, LLC., UEA PREMIER MOTORS CORP., DLA CAPITAL PARTNERS, INC., JONES, LITTLE & Co., CPA'S, LLP, FLUSHING BANK, and LIBERTAS FUNDING, LLC.,

Defendants.

Case No. 2:23-cv-6188
(JMW)

**DECLARATION OF
ANTHONY DEO
PURSUANT TO THE
JANUARY 18, 2024
MEMORANDUM
ORDER OF THE
HONORABLE
MAGISTRATE JUDGE
JAMES M. WICKS**

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Anthony Deo declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I respectfully submit this Declaration pursuant to the Memorandum Order of the Honorable Magistrate Judge James M. Wicks, dated January 18, 2024 (the "Order") (ECF Doc. 135), which directed the Deo Defendants (as more fully defined in the Order), no later than January 31,

2024, to provide Plaintiff and upload to ECF, photographs of the vehicles' odometer readings along with a sworn affidavit, proof that the vehicles are in an enclosed facility, and proof of full vehicle insurance coverage.

Photographs of the Vehicles' Odometers

2. Annexed hereto as **Exhibit A** are photographs of the odometers of the six (6) vehicles, as they exist today, January 31, 2024, together with timestamps of when each photo was taken.


Storage of the Vehicles in an Enclosed Facility

3. The vehicles are currently being stored in an enclosed facility. Specifically, the vehicles are being stored at Luxsport Motor Group, LLC ("Luxsport"), located at 1 Hollow Lane, New Hyde Park, New York 11042. Annexed hereto as Exhibit B are photographs of the six vehicles, as they exist today, January 31, 2024, in Luxsport's garage.

Insurance Coverage

4. Full vehicle insurance coverage exists for all six of the vehicles. First, the vehicles are covered under the insurance policy held by my dealership, Gold Coast Motors of Syosset, LLC ("Gold Coast"). True and correct copies of the Certificates of Insurance are annexed hereto as Exhibit C. Under the terms of this policy, the policy covers vehicles that constitute dealer inventory, as well as any vehicles stored in a garage. In addition to Gold Coast's insurance, the six vehicles are also covered by Luxsport's insurance policy, which provides coverage for damage incurred to any vehicle that is stored within their storage facility. True and correct copies of Luxsport's insurance declaration is also found within the annexed **Exhibit C**.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 31, 2024.


Anthony Deo (Jan 31, 2024 18:43 EST)
Anthony Deo

Signature: 
Anthony Deo (Jan 31, 2024 18:43 EST)

Email: anthonyd@northshoremotors1.com

2024-01-24-Superb v. Deo - Decl. Compl. w. Jan 18th Order

Final Audit Report

2024-01-31

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